



Tennessee Dept. of Environment and Conservation  
Division of Solid Waste Management  
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401 Church St.  
Nashville, TN 37243-1535

May 5, 2009

Cynthia M. Anderson  
Tennessee Valley Authority  
1134 Swan Pond Rd.  
Harriman, TN 37748

This office has reviewed your proposal as described in your April 30, 2009 letter and attachments. Prior to approving this request, please provide the following information.

At 2.1 of the Ash Loading Test Plan:

It is not clear what the moisture requirements will be immediately prior to loading the ash into the railcars as it is not adequately discussed in section 2.2. It is therefore not determined how the generation of dust will be prevented during the loading operation or how it will be monitored. While the moisture content of the stockpiled ash is to be between 20 and 30 percent, what is the intended moisture content at time of loading?

At 3.1.2 of the Ash Loading Test Plan:

It is not clear how the application of Soiltac© will act as a liner. This material appears to be intended as a soil stabilizer or solidifying agent and while it may act as a cover material, it does not appear to be designed to function as a liner. You should also specify what parameters will be used to evaluate equivalence.

Final evaluation of the Ash Loading Test Plan will be completed following receipt of the aforementioned items.

Sincerely,

*Mike Apple by Jaf*

Mike Apple  
Director

CC: Tom Welborn, Section Chief, EPA Region 4  
Leo Francendese, Waste Division, EPA Region 4  
Saya Qualls, DWPC, TDEC  
Paul Sloan, Deputy Commissioner, TDEC  
Paul Davis, Director DWPC, TDEC  
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